

### **REMARKS**

The application contains claims 1-3, 7-18, 20 and 22-26. By entry this amendment, claims 1, 7, 8, 15, 17, 20 and 22-25 have been amended. Applicant respectfully submits that the claim amendments do not alter the scope of the claims, and that further search and consideration is not required. In view of the foregoing amendments and following remarks, Applicant respectfully requests withdrawal of the final Office Action, and allowance of the application.

#### **35 U.S.C. §112, first and second paragraph rejections**

Claim 1 was rejected under 35 U.S.C. §112, first paragraph for failing to comply with the written description requirement because the term "further" was not used in the specification. Applicants have deleted the term from the claim, and respectfully submit that claim 1 recites subject matter that satisfies the requirements of 35 U.S.C. §112.

On page 3 of the Office Action, the Examiner appears to be rejecting claim 1 under 35 U.S.C. §112, second paragraph.

The Office asserts that what comprises the features of "storing the file" and "recording the binary structure of the file in a memory of the mobile device" are not described in the specification. Applicants respectfully submit that the claimed feature of "storing the file" is sufficiently described at least at page 8, lines 12-20, and "recording the binary structure..." is described at least at page 8, line 33-page 11, line 25 with reference to Fig. 3.

The Office also asserts that the specification does not describe what comprises "an initial run of a computer application" or "a startup of the computer program." However, at least at page 8, lines 13-17 of Applicants' specification, it states "when the application is run for the first time" when referring to the computer application, or first running at page 8, lines 27-29.

The Office at page 3 further states that the specification does not describe in a clear and concise manner the difference between "file" and the "the binary structure". However at page 8, lines 13-19, Applicants describe the conversion of a file into a binary structure that is machine readable.

Applicants respectfully submit that all of the claimed features are disclosed in Applicants' specification to meet all of the requirements of 35 U.S.C. §112. Applicants request the withdrawal of the rejections of claim 1 under 35 U.S.C. §112 be withdrawn.

## **Prior Art Rejections**

### **Claims 1-3, 7-18, 20 and 22-26 Define over Kuznetsov, Coulthard et al. and further in view of Reha et al.**

Claims 1-3, 7-18, 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kuznetsov (U.S. Pat. Pub. No. 2001/0056504) in view of Coulthard et al. (U.S. Pat. Pub. No. 2004/0003013) and further in view of Reha et al. (U.S. Patent No. 6, 282,709). Applicant respectfully requests withdrawal of these rejections because neither Kuznetsov nor Coulthard nor Reha, either alone or in combination, teach or suggest all elements of independent claims 1, 15 or 20.

Amended claim 1 now recites:

A method, comprising:

(a) creating in a design environment a file that determines a metadata that relates at least one business object and at least one query;

(b) communicating the file to a mobile device;

(c) storing the file on the mobile device;

(d) transforming the file into a binary structure at an initial run of a computer application running on the mobile device, the binary structure adapted to be read by the computer application; and

(e) recording the binary structure in a memory of the mobile device, wherein the method further comprises:

storing a timestamp and a filesize in the memory with the binary structure, the timestamp and the filesize uniquely identifying the file corresponding to the binary structure;

determining whether the file has been updated upon a startup of the computer application by comparing a timestamp and a filesize of a file currently loaded on the mobile device to the timestamp and the filesize, respectively, recorded with the binary structure; and

mapping the binary structure, transformed from the currently loaded file, by the computer application from the memory if the file has not been updated.

An aspect of the present invention provides a mobile device application with access to a database. In particular, features of the present invention, as recited in claim 1, enable a mobile device to effectively manage updated versions of files it receives.

Specifically, claim 1 recites “communicating the file to a mobile device”, which the Office asserts is disclosed at paragraphs [0104] and [0106] of Kuznetov. However, paragraph [0104] merely states specific applications of the illustrative embodiments in which one of the several listed is XML <->bXML (WAP) transcoding for wireless and PDA applications. This does not mean communicating the file to a mobile device as recited in claim 1. Paragraph [0104] does not state which file is sent to the mobile device. In fact, paragraph [0106] appears to suggest that it is the bXML file that is sent to the mobile device. Paragraph [0106] of Kuznetov states “The growing role of wireless personal devices (Palm Pilots, cell phones, web tablets and others) means that websites must also convert their content to binary XML-based WAP (Wireless Application Protocol) content.” (Emphasis added). This suggests that any conversion will be performed at the service provider and not at the mobile device.

The remainder of paragraph [0106] suggests the service providers and content providers will save in the transformation of XML to bXML, when it states,

“Personalization and dynamic pages are even more prevalent in WAP applications, requiring potentially one XSLT transformation per page per wireless client—an overwhelming burden on even the best servers or WAP gateways. As the number of personal device clients with Internet connectivity grows to millions, the illustrative embodiment enables wireless service and content providers to keep pace.” (emphasis added.)

The citation to paragraphs [0104] and [0106], when viewed in the context of the system Kuznetov is providing does not disclose or suggest the claimed feature, in combination with the other steps recited in the claim, of communicating the file to a mobile device. Applicant respectfully submits that any file communicated to a mobile device in Kuznetov is already transformed into what ever format that will be used by the mobile device. In other words, it appears there is no further processing of a file necessary on the mobile device in the system of Kuznetov.

Kuznetsov does not disclose other features recited in the claim 1.

Specifically, claim 1 recites, in combination with the above discussed feature and other features, the above highlighted feature of “transforming the file into a binary structure at an initial run of a computer application running on the mobile device, the binary structure adapted to be read by the computer application.”

The Office Action alleges that Kuznetsov, at paragraphs 40, 83, and 90 discloses the above highlighted feature. Applicant disagrees as paragraph 40 of Kuznetsov is directed to a

translator that “translates the data as it arrives from any typical source” and this clearly does not disclose the step.

At paragraph 83, Kuznetsov discloses the optimization of an XML translator, it does not disclose or suggest the above step as recited in claim 1.

Finally, the Office alleges that paragraph 90 of the Kuznetsov discloses the claimed step of transforming the file into a binary structure at an initial run of a computer application running on the mobile device, the binary structure adapted to be read by the computer application. However, paragraph 90 states, in part, “XSL processing must remain dynamic , so any optimizations should occur at runtime.” The XSL processing refers to an XML to XML translation, see paragraph [0083] and paragraph [0086], last sentence. Not “transforming the file into a binary structure at an initial run of a computer application running on the mobile device, the binary structure adapted to be read by the computer application” as recited in Applicant’s independent claims.

None of the cited portions of Kuznetsov disclose or suggest the above highlighted features, in combination with the other features, recited in Applicant’s independent claim.

As for Coulthard, it does not make up for the above described deficiencies of Kuznetsov, as described in Applicant’s previous response. Applicant respectfully submits that neither Kuznetsov nor Coulthard, either individually or in combination, disclose or suggest all of the features recited in Applicant’s independent claim 1.

The Office states that the combination of Kuznetsov and Coulthard does not disclose the claimed step of determining whether the file has been updated upon a startup of the computer application. The Office relies on Reha to disclose this feature.

Reha does not overcome the above-described deficiencies of Kuznetsov. Applicant respectfully submits that Kuznetsov, Coulthard, and Reha, either individually or in any combination, fail to disclose or suggest all of the features recited in Applicant’s independent claims.

Accordingly, Applicants respectfully request withdrawal of the final Office Action, and further examination of the claims.

Claims 7-14 depend from independent claim 1 and are allowable for at least the reasons applicable to claim 1, as well as due to the features recited therein.

Independent claims 15 20 and 26 recite limitations similar to those of claim 1 and are therefore allowable over Kuznetsov nor Coulthard et al. for at least those reasons mentioned above with respect to claim 1.

Claims 16-17 and 22-25 are allowable for at least those reasons stated above and based on their dependency on independent claims 15 and 20, respectively.

### CONCLUSION

Applicant respectfully requests entry of the above amendments and favorable action in connection with this application. The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. 1.16 or 1.17 to Kenyon & Kenyon Deposit Account No. 11-0600. The Examiner is invited to contact the undersigned at (202) 220-4419 to discuss any matter concerning this application.

All claims are allowable. Allowance is solicited.

Respectfully submitted,  
KENYON & KENYON LLP

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